



# TACOMA HOUSING AUTHORITY

## RESOLUTION 2016-09-28 (2)

**Date:** September 28, 2016  
**To:** Board of Commissioners  
**From:** Michael Mirra  
Executive Director  
**Re:** Approval of THA's 2017 Moving to Work Plan

This resolution would authorize the Executive Director to submit to HUD THA's Fiscal Year 2017 Moving to Work (MTW) Plan. The Plan proposes no new initiatives and a revision to an existing activity.

### Background

Each year, Tacoma Housing Authority (THA) proposes new MTW activities intended to meet the statutory goals of the MTW program:

- Reduce costs and achieve greater cost effectiveness in federal expenditures;
- Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

MTW "activities" are best described as new things THA wishes to do that require waiving Housing and Urban Development (HUD) regulations. Staff has gone through a community and staff consultation. This year THA is not proposing any activities for FY2017. It does propose a revision to an existing activity.

This year, Sheryl Stansell met with each department director and executive staff to understand the agency's MTW needs and priorities. She consulted with the staff of Rental Assistance, Property Management and Community Services teams. Results of the consultation process informed which new activity ideas and/or revisions to existing activities would be included in the MTW Planning memo to THA's Cabinet for inclusion in the 2017 planning process.

While many of staff's suggestions would not require further MTW flexibility, staff voiced the desire to take another look at many of THA's existing activities and their policy implications. Examples include portability policies, when THA will and will not process rent reductions based on interim income changes, the Housing Opportunity Program payment standard amount and the Family Self-Sufficiency program pay points. Revisions to these policies will require further research. Staff does not propose any such revisions this year. Each policy will be evaluated separately. The Board should expect to see proposals on any revisions to these policies in the coming months.



New activities were suggested from executive leadership but the proposed plan does not include them because staff does not have the time to conduct the research necessary to deploy such programs. This includes an expansion of the College Housing Assistance Program and the development of a rental assistance program for formerly incarcerated individuals. We will work on both of these programs in 2017. If MTW authority is necessary for either of these programs, THA may submit an MTW plan amendment in 2017.

### **2017 MTW Plan**

The 2017 MTW Plan does not include any new activities but does include one revision to an existing activity. The revision is to the “Local Income and Verification Policies” activity.

THA key holders are essential to the proper functioning of THA’s properties. They provide a reassuring and very useful presence and supervision to each senior building. THA pays each key holder a wage. When THA initially implemented rent reform for the populations residing in its properties, we told key holders that we would exclude their key holder wage from their rent calculation. This turned out to be more complicated than we thought. THA does have MTW flexibility to disregard any income from resident stipends but the income earned by key holders is not technically a stipend. We could not exclude it from the rent calculation without a further change to the MTW plan. In this proposed plan, we would make that change to exempt earned income from the key holder’s rent calculation. This will make the Key Holder position more appealing to residents.

Any changes to the MTW Plan that are approved by the board and HUD will be updated in THA’s Administrative Plan.

The draft plan can be viewed by following this link: <http://tacomahousing.net/content/moving-work-0>

### **Community and Staff Consultation**

During the planning process, there has been staff input and attempts to consult the community. Staff brainstorming sessions were held and recommendations for the FY 2017 Plan were submitted to the Cabinet. After receiving approval from the cabinet to go through the public hearing process, THA has taken the following actions to receive feedback:

- Executive leadership consultation.
- Staff planning sessions.
- Public comment notice and draft MTW Plan made available on THA’s website.
- Public Hearing for current residents and all interested parties on August 31<sup>st</sup>.

No public comments were received during the public comment period.

### **Recommendation**

Authorize THA’s Executive Director to submit the Housing Authority of the City of Tacoma’s Fiscal Year 2017 Moving to Work (MTW) Plan.





# TACOMA HOUSING AUTHORITY

## RESOLUTION 2016-09-28 (2)

### Certifications of Compliance

**Annual Moving to Work Plan  
Certifications of Compliance**

**U.S. Department of Housing and Urban  
Development, Office of Public and Indian  
Housing**

### **Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan\***

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning 2015, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.

7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.

8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.

9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105( a).

15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.

16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).

20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Housing Authority of the City of Tacoma WA005

**PHA Name**

**PHA Number/HA Code**

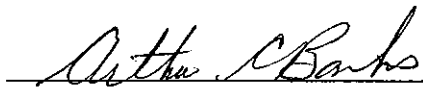
I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Arthur Banks

**Name of Authorized Official**

Chair

**Title**



**Signature**

9/28/16

**Date**

\*Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.